



August 27, 2014

Mr. Blake Guillory, Executive Director
South Florida Water Management District
P.O. Box 24680
West Palm Beach, FL 33416-4680

Dear Mr. Guillory:

I am writing to make you aware of a critically important issue facing rural Palm Beach County that threatens to overwhelm this part of our great state both fiscally and environmentally. Your help in preventing this outcome is needed as quickly as possible to protect area citizens and the region's considerable natural lands and water quality and supply. If this project goes forward, it will set in motion a cascade of other projects in the same area with many of the same negative transportation, water-related and fiscal impacts.

The Minto West project, proposed as a comprehensive plan amendment on almost 3,800 acres in a remote, low density area of western Palm Beach County, is an out of scale, out of place project that is simply incompatible with the rural nature and natural resources in this area. Rather than work within the already authorized level of development for the area, what is now being requested is a 50% increase in new homes and more than an 800% increase in commercial, retail and institutional space.

The traffic impacts alone attest to the project's magnitude – the proportionate share costs to the developer alone exceed \$55,000,000, and this does not include the considerable and yet-to-be-determined cost to the County's taxpayers associated with the many expansions of two-lane to four-lane, four-lane to six-lane, and even some six-lane to eight-lane improvements if the project goes forward. Such major infrastructure investment will also open the area to additional development, further threatening the area's natural resources and quality of life.

Even the related water and drainage issues have yet to be resolved by any of the review agencies. For example, no definitive resolution has been reached regarding drainage to the C-51 canal to benefit Lake Worth Lagoon, Loxahatchee Slough or the Northwest Fork of the Loxahatchee River. No agreement has been reached with West Palm Beach and its drinking water reservoir at Grassy Waters Preserve. And finally, no comprehensive agreement(s) with the SFWMD has been reached concerning the project's role in the region with respect to flood control, water flows and storage. In fact, SFWMD indicated it would need to restart the federal planning process to comprehensively assess regional water needs in this area. How can an informed decision be made without such critical information?

Being aware of other proposed new developments in this same area, including Avenir (Vavrus), G.L. Homes, and Highland Dunes, it is not surprising that the Indian Trails Improvement District, Loxahatchee Groves, Royal Palm Beach, and several neighborhood groups have voiced numerous traffic and other objections.

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Mr. Blake Guillory

August 27, 2014

Page Two

We have notified your review staffs and the County Commission about our concerns in a letter dated August 23, 2014. This area of Palm Beach County cannot reasonably maintain its rural character and protect its natural lands and waters while becoming a regional economic, employment or retail center. This is a true "quality of life" issue that area residents seek to maintain. Can you imagine under any circumstance how a project of this size, whose scale approaches the massive Saw Grass Mills Mall in Broward County, can be compatible in a truly rural area?

The County's Planning Commission **denied this proposed project not once but twice**. In part, its judgment considered the current allowed land uses of 2,996 residential units and 235,000 square feet of commercial and institutional space to be more in keeping with the surrounding rural area. In fact, the County agreed in 2008 that this level of development was compatible with the surrounding area.

To conclude, **the Minto West project as proposed is out of scale with the rural character** of the surrounding community. The transportation impacts due to significant density increases for residential units and major institutional square footage space, as well as major unresolved drainage issues, simply show that the proposed **project is not compatible with existing development and has significant impacts to the environment and taxpayers**.

To the extent that this site is appropriate for some level of development, we **respectfully request that you raise objections to this project as proposed and that you ask the County to work with the applicant and surrounding communities to develop a project using the 2,996 residential units and 235,000 square feet of commercial uses already authorized**.

Thanking you for your time and considerations, I am

Sincerely,



Charles G. Pattison, FAICP

Policy Director